

Exhibit No.	:	
Witness	:	ROBERT F. RENNICK
Type of Exhibit	:	Surrebuttal Testimony
Party	:	CITY OF JEFFERSON
Issue	:	City of Jefferson Fire Suppression
Case No	:	WR-2007-0216

CITY OF JEFFERSON

Case No. WR-2007-0216

SURREBUTTAL TESTIMONY

OF

ROBERT F. RENNICK

Jefferson City, Missouri
July, 2007

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of Missouri-American Water Company's)	
Request for Authority to Implement a General Rate)	Case No. WR-2007-0216
Increase for Water Service Provided in Missouri)	
Service Areas)	

AFFIDAVIT OF ROBERT F. RENNICK

STATE OF MISSOURI)
) ss.
COUNTY OF COLE)

I, ROBERT F. RENNICK, of lawful age, being duly sworn, do hereby depose and state:

1. My name is ROBERT F. RENNICK. I am the Fire Chief for the Jefferson City Fire Department.
2. Attached hereto and made a part hereof for all purposes is my surrebuttal testimony.
3. I hereby swear and affirm that my answers contained in the attached testimony to the questions therein propounded are true and correct to the best of my personal knowledge, information and belief.

/s/ Robert F. Rennick
Robert F. Rennick

Subscribed and sworn to before me, a Notary Public, this 31st day of July, 2007.

/s/ Annette M. Borghardt
Notary Public for Cole County, MO;
Commission # 06436657; M.C.E. 3/11/2010

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SURREBUTTAL TESTIMONY

Q. WHAT IS YOUR NAME, TITLE AND BUSINESS ADDRESS?

A. My name is Robert Frank Rennick, and I am the Fire Chief for the Jefferson City Fire Department. My business address is City Hall, 320 East McCarty, Jefferson City, Missouri.

Q. ARE YOU THE SAME ROBERT RENNICK WHO PREVIOUSLY FILED WRITTEN DIRECT TESTIMONY IN THIS MATTER

A. Yes, I am.

Q. WHAT IS THE PURPOSE OF YOUR SURREBUTTAL TESTIMONY?

A. I will respond to the rebuttal testimony of Missouri American Water Company's witness, Mr. Greg Weeks.

Back Up Generation

Q. MR. WEEKS TESTIFIES ON PAGE 2 OF HIS REBUTTAL THAT THE COMPANY IS IN THE DESIGN PHASE FOR PERMANENT INSTALLATION OF A BACK UP GENERATOR AT THE JEFFERSON CITY PLANT, AND HE ANTICIPATES INSTALLATION BY YEAR END 2007. DOES THIS SATISFY YOUR CONCERN ABOUT POWER AVAILABILITY AT THIS LOCATION?

A. I certainly consider this a very good step forward. I will add that since the filing of Mr. Weeks' testimony, I have visited with him directly about the prospect of the on site back up generation equipment and understand that bids for the generator were to be received

1 by the Company on July 17, 2007 and opened the same day. Mr. Weeks' testimony does
2 not give any details about the output of the generator but I will assume it has been
3 designed to handle the emergency load at the plant in the event of a widespread
4 interruption in power.

5
6 Q. IN YOUR OPINION, SHOULD THE GENERATOR BE ON LINE BEFORE
7 JANUARY 2008.

8 A. I think the Company's schedule to have the generator on line by year end 2007 is
9 acceptable but there should be no reason why a longer period of time would be required.
10 The Commission should insist that the Company meet the schedule Mr. Weeks has
11 described in his testimony.

12
13 **Storage Capacity and Transmission Mains in Jefferson City**

14 Q. REGARDING YOUR CONCERNS ABOUT 1) LACK OF ADEQUATE STORAGE
15 FACILITIES, AND 2) THE VARYING SIZES OF TRANSMISSION MAINS
16 INTERCONNECTED IN THE SYSTEM, MR. WEEKS IN REBUTTAL POINTS TO
17 AN ONGOING COMPANY STUDY THAT INCLUDES HYDRAULIC MODELING.
18 ARE YOU AWARE OF ANY DETAILS OF THIS STUDY?

19 A. No, I am not and no specific details appear from Mr. Weeks' testimony. Gilbert Cole, the
20 Company's local manager, has several times told me and other officials of Jefferson City
21 in the last two years that the Company conducts or has been conducting studies on
22 capacity additions and demand forecasts but the results of any recent studies have never
23 been disclosed to me or the City to the best of my knowledge. I must question whether

1 the study referred to by Mr. Weeks will be handled any differently. Again, Mr. Weeks
2 does not supply any details as to the scope of the study, its progress to date, preliminary
3 findings and any definite date of final approval.

4
5 Q. IS A COMPREHENSIVE STUDY OF FORECASTED CONSUMER LOADS AND
6 RELATED SUBJECTS A NECESSITY FOR PURPOSES OF DETERMINING THE
7 COMPANY'S NEED FOR ADDITIONAL STORAGE?

8 A. In my opinion, the information needed to make that determination has been gathered and
9 analyzed already. From what the parties learned in preparing the Joint Report in Case
10 No. WO-2004-0609, and just the daily demand data for Jefferson City available to the
11 Company from the previous two summer seasons here, I believe that the Company should
12 now be taking deliberate steps to construct tower(s) that would store an additional three
13 million gallons in the Jefferson City service area.

14
15 Q. EXPLAIN WHY YOU SUGGEST THREE MILLION GALLONS MORE IN
16 STORAGE FOR THE COMPANY.

17 A. First, this amount of storage will replace that which the Company at one time had
18 available by contract with neighboring Public Water Supply District No. 2. This
19 agreement expired in 2000. Under that agreement, the Company was able to utilize the
20 overhead storage tanks of District No. 2 to supplement the Company's storage capacity
21 and daily demands within its system. After this contract expired, the Company erected
22 the 1.5M gallon storage tank on Ellis Boulevard but even with this new facility, the
23 Company's storage capacity is approximately 2M gallons less than it was when the

1 District No. 2 contract was in force. I understand that at present, the Company water
2 storage in the Jefferson City service area is approximately 3M gallons.

3
4 Second, additional storage at this level will provide needed nonpumped pressure for the
5 system even in times when demand is peaking due to high temperature events.

6
7 Last, with respect to the amount of the storage to be constructed, I recommend 3M
8 gallons since this amount would greatly improve the Company's ability to cover higher
9 demands for water occurring during the summer as the City has experienced in the last
10 two years. According to the Company's responses to data requests which the City
11 submitted to the Company, average daily water demand in July and August, 2006 in
12 Jefferson City was 5.32 and 5.47 million gallons per day respectively. The Company has
13 the ability to treat approximately 7M gallons per day. Based upon reports submitted to
14 my office in summer of 2006, the Company's peak demand on one day was at that point.

15
16 If treatment capacity cannot be expanded at the Company's facilities the other alternative
17 to ease the problems I have mentioned is to increase storage. Although the Company has
18 emergency interconnects with the local public water supply districts, in times of drought
19 or high temperatures, the Districts themselves experience similar demands on their
20 delivery of water, and emergency interconnects would be unreliable. Boosting the
21 Company's water storage in Jefferson City to 6M gallons would certainly reduce the need
22 for emergency measures in the summer.

1 Q. WHERE COULD THE TOWER OR TOWERS BE LOCATED?

2 A. Construction of new water towers is a land use issue and because of their appearance the
3 erection of water towers is generally objected to, however, there are locations in this City
4 where elevated storage would likely do the most good and those happen to be areas
5 where the towers would blend with continuing development and redevelopment. For
6 instance, the City owns property near the Unilever facility on Truman Road which is a
7 high point in the City. The area is already industrially zoned. Another possible location
8 involves property on the east side of the city. The state of Missouri and the City are
9 teaming to redevelop the former Missouri Correctional Center site. In connection with
10 that redevelopment, the State's Division of Surplus Property will be relocated leaving
11 another high point in the city available.

12
13 The time for the Company to begin the process of increasing needed storage for the
14 Jefferson City service area is now, and that process should not be delayed to allow
15 another Company study to run its course. My Department, and other City departments as
16 well, are most interested in working in coordination with the Company in achieving
17 greater storage for the area. That additional storage has benefits for fire suppression and
18 gives greater convenience to the customers here, particularly in the hottest part of the
19 summer.

20
21 Q. WITH RESPECT TO POTENTIAL WEAKNESSES IN THE TRANSMISSION GRID
22 CAUSED BY THE VARYING DIAMETERS OF THE COMPANY'S MAINS, WILL
23 THE HYDRAULIC MODEL REFERRED TO BY MR. WEEKS BE BENEFICIAL?

1 A. I tend to agree with Mr. Weeks on this issue and look forward to the recommendations of
2 the study. However, the study should be finalized and the recommendations available to
3 my department no later than the end of calendar year 2007.

4

5 Q. DOES THIS CONCLUDE YOUR SURREBUTTAL TESTIMONY?

6 A. Yes, it does.